

BREMACH, Inc.



P.O. Box 19294
Jean, Nevada 89 019

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FAX: (702) 723-1641

E-mail: info@bremach.us
Website: <http://www.bremach.us/>

October 13, 2021

TO:
David C. Hurlin
EPA Imports Line, Exemptions
Imports@epa.gov

RE: **Request for extension of Temporary Importation – TESTING**
Exemption Number: 2020-NOVEMBER-LD-TEST-I-13811
Dated: 11/18/2020

Request is being made by:
Miro Kefurt, CEO
Bremach, Inc.
PO Box 19294
Jean, NV 89019

NOTE:
The original Exemption Letter is re-used as template with the relevant current information added in blue.

Original Test Purpose:

- 1.) Initial engineering evaluation of the two vehicles to determine if they are capable to meet both EPA and CARB exhaust and evaporative emission standards for 2022 Model Year vehicles.

Items Completed as of to date:

Engineering Evaluation of Evaporative system and complete disassembly of the Fuel System (Black SUV) – all items were found to be most likely compliant with current CARB/EPA regulations, with following exception:

- a.) No canister “vent valve”
- b.) No EVAP test software in currently used ECU
- c.) No OBD Evap fail codes in current software

Items yet to be done:

- a.) Add canister “vent valve” and Vent Line Filter
- b.) Design and implement EVAP test software for currently used ECU

c.) Design and implement OBD Evap fail codes for currently used ECU

- 2.) Mileage accumulation on California Reformulated gasoline with 10% Ethanol content and octane rating of 87. Mileage accumulation will be done over 3.7 mile (6 km) track located in Clark County, Nevada and transiting into San Bernardino County California.
(Images attached).

This item was Completed as of 1/24/2021. (White SUV only)

- 3.) After accumulation of prescribed 4,000 miles the vehicles will be tested for evaporative emissions in ATDS laboratory in Ontario, California
This item was NOT Completed as of to date, due to issues related to Evaporative System found in Item #1.

Items yet to be done:

After the EVP and OBD are upgraded, this test will be conducted on the Black SUV

- 4.) After the mileage accumulation of prescribed 4,000 miles the vehicle will be tested for Exhaust emissions at SEMA laboratory in Diamond Bar, California
This item was Completed as of 7/15/2021. (White SUV only)
The testing could not be performed sooner as we have found that the ABS/Traction system did not allow the vehicle to be ran on two roller dynamometer in RWD, when front wheels are stationary.

Change of the software was required which resulted in 6 months delay (Jan to July)

The upgrade was done on both vehicles

- 5.) When above laboratory tests are concluded, based on result the data will be provided to EPA and CARB as part of vehicle certification for 2022 Model Year.

*This item was NOT Completed as of to date, because the FTP testing revealed that the **ULEV 160** standard is exceeded by 50%, and therefore engine and software mapping and re calibration is needed.*

Laboratory results from SEMA are attached in separate document.

Due to the unforeseen delays we are now planning for 2023 Model Year certification.

The testing needs to be done in USA as in the country of origin the required gasoline Blend (E10) is not available and there are no EPA or CARB certified laboratories in Russian Federation.

Vehicle Identification:

Make: UAZ Brand: UAZ Manufacturer: UAZ LLC Model: Patriot
Vehicle Class: MPV Fuel: Gasoline Engine Type: Four Cylinder Displacement: 2.7L

Vehicle Identification (continued)

Vehicle #1

UAZ 3163-486-67 (model)

XTT316300M1001007 (VIN)

2021 (model Year) □ Manufactured in June 2020

\$16 384 (vehicle value)

Body Color **Black**

Vehicle #2

UAZ 3163-486-67 (model)

XTT316300M1000102 (VIN)

2021 (model Year) Manufactured in June 2020

\$16 384 (vehicle value)

Body Color **White**

Vehicle ownership (and to whom vehicles will be released and shipped from USA)
(see attached invoice)

INVERSIONES UAZ CHILE SPA
CARMENCITA 290, LAS CONDES, SANTIAGO, CHILE

Reason Exemption is sought:

It is unknown if the vehicles as manufactured are capable of meeting the EPA and CARB requirements for 2022 MY vehicles, until above mileage accumulation and evaporative and Exhaust tests are performed. The vehicle as manufactured currently meet the **EURO 5** environmental standards as per European Union regulations.

(a) estimated of the program duration;

- 1.) Initial engineering evaluation – 3 to 6 weeks
- 2.) Mileage accumulation – less than 3 months
- 3.) Evaporative Emission Testing – about 2 weeks*
- 4.) Exhaust Emission Testing – about 3 weeks*

Items marked with (*) depend on Test laboratory availability and scheduling.
It is expected that all required tests will be concluded not later than December 31, 2021.

(b) the number of vehicles or engines involved; Two Complete Vehicles

(c) year and gross vehicle weight rating of each vehicle or engine.

Model Year 2021 – representative configuration of intended 2022 Model Year

•Weight
(standard car without options) 2125 kg 4684 lb.

•GVWR
(standard car without options) 2650 kg 5842 lb.

•Maximum Load Capacity
(Passengers and cargo) 525 kg 1157 lb.

(ci) Both vehicles are identical except for body color, one is white and the other black

4(a) the technical nature of the test; To determine if vehicles satisfy EPA and CARB requirements for 2022 Model Year gasoline engine vehicles (MPV)

4(b) the site of the test;

Engineering Evaluation: MIROX Corporation, 95 N Cree St, Sandy Valley, Nevada, 89019

Evaporative Test: ATDS 400 S Etiwanda Ave, Ontario, CA 91761

Exhaust Dynamometer Test: SEMA 1575 Valley Vista Drive, Diamond Bar, CA 91765

Mileage accumulation: Sandy Valley Nevada and California (see attached map)

(c) the time or mileage duration of the test;

Mileage accumulation: 4,000 miles on each vehicle

Achieved on the White SUV, but not on the Black SUV as we intent to do the mileage accumulation on the Black SUV only AFTER the EVP and OBD systems are fully functional and properly evaluated.

(ci) estimated of the program duration;

1. Initial engineering evaluation – 3 to 6 weeks – *Completed (both vehicles)*

2. Mileage accumulation – less than 3 months – *Completed on White SUV only, yet to be done on the Black SUV*

3. Evaporative Emission Testing – about 2 weeks* - *Not attempted due to lack of EVAP and OBD functionality, will be done as soon as hardware and software upgrade is completed – new estimate is about March 2022.*

4. Exhaust Emission Testing – about 3 weeks* - *Will be done on the Black SUV as soon as above Item #3 is completed*

(cii) Items marked with (*) depend on Test laboratory availability and scheduling.

It is expected that all required tests will be concluded by about October 2022.

(d) the ownership arrangement with regard to the vehicles or engines involved in the test;

Vehicle ownership (and to whom vehicles will be released and shipped from USA)

(see attached invoice)

INVERSIONES UAZ CHILE SPA

CARMENCITA 290, LAS CONDES, SANTIAGO, CHILE

(e) the intended final disposition of the vehicles or engines;

Vehicles will be shipped to:

INVERSIONES UAZ CHILE SPA

CARMENCITA 290, LAS CONDES, SANTIAGO, CHILE

(f) the manner in which vehicle identification numbers or the engine serial numbers will be identified, recorded, and made available;

Photographic Images of the VIN will be made when vehicles arrive to USA (Los Angeles Port)

(g) the means or procedure whereby test results will be recorded.

Mileage accumulation: By Daily Log and also Data Acquisition from OBD II port and additional on board test equipment.

Evaporative Test: From Test results provided by ATDS

Exhaust Test: From Test results provided by SEMA

I hope that above provided information is adequate for EPA to grant the extension of Testing Exemption.

Exemption Number: 2020-NOVEMBER-LD-TEST-I-13811

Dated: 11/18/2020

Thank you.

Sincerely

A handwritten signature in black ink, appearing to read 'Miro Kefurt', with a long horizontal flourish extending to the right.

Miro Kefurt - CEO
BREMACH, Inc.

PS: BREMACH, Inc. has manufacturer account with EPA, the identification is **BRH**

APPENDIX:

Mileage Accumulation Test Track Route:

Map:

Attached to e-mail:

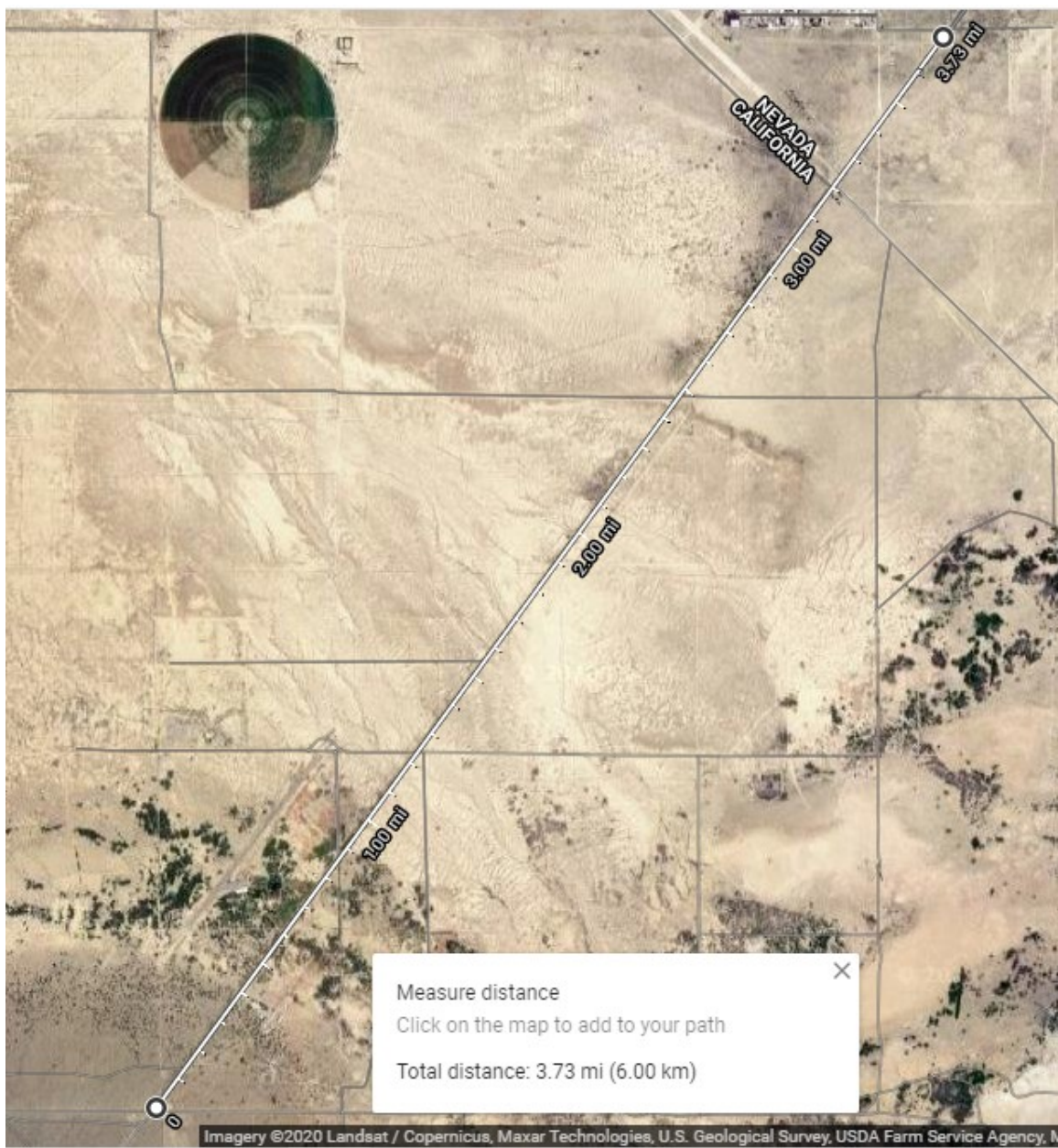
Results from Emission test by SEMA Laboratory



Mileage Accumulation as per
Appendix IV to Part 86—Durability Driving Schedules

Mileage Accumulation Test Track Route:

Satellite (Google Maps):



Appendix IV to Part 86—Durability Driving Schedules

(a) Durability Driving Schedule for Light-Duty Vehicles and Light-Duty Trucks.

The schedule consists basically of 11 laps of a 3.7 mile course. The basic vehicle speed for each lap is listed below:

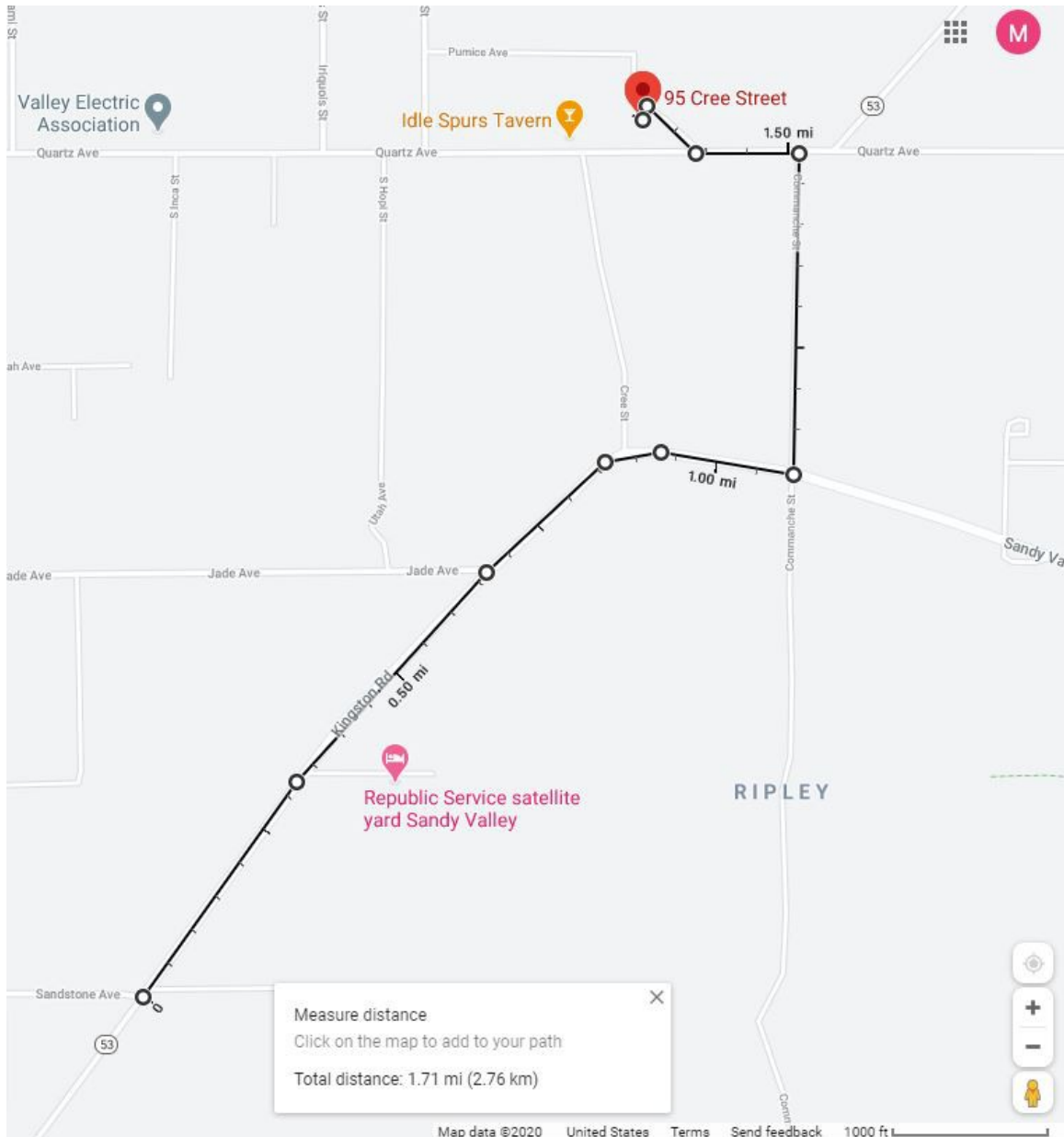
Lap	Speed miles per hour
1	40
2	30
3	40
4	40
5	35
6	30
7	35
8	45
9	35
10	55
11	70

During each of the first nine laps there are 4 stops with 15 second idle. Normal accelerations and decelerations are used. In addition, there are 5 light decelerations each lap from the base speed to 20 m.p.h. followed by light accelerations to the base speed.

The 10th lap is run at a constant speed of 55 m.p.h.

The 11th lap is begun with a wide open throttle acceleration from stop to 70 m.p.h. A normal deceleration to idle followed by a second wide open throttle acceleration occurs at the midpoint of the lap.

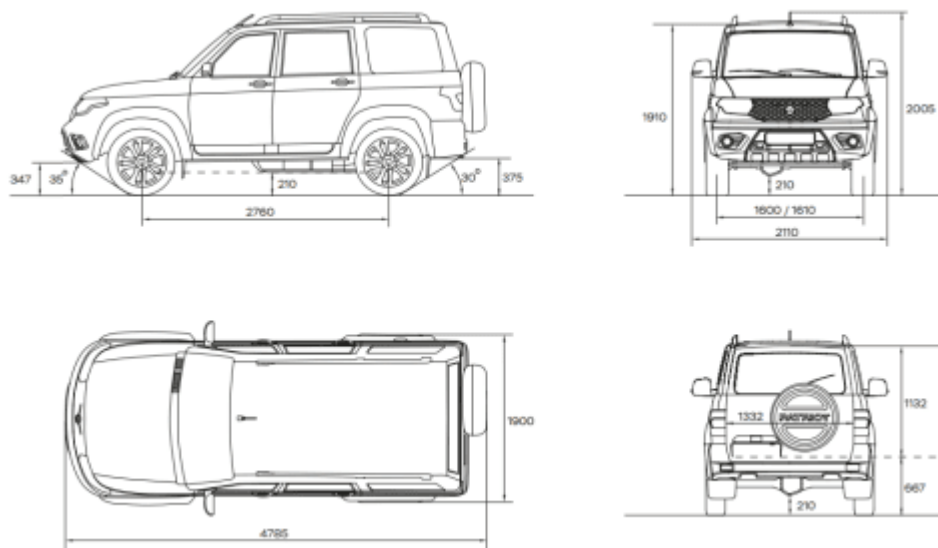
Transit Section from Mileage Accumulation Track
To vehicle service, refueling and overnight storage
Located at 95 N Cree St, Sandy Valley, NV 89019
MIROX Corporation



Vehicle Specifications:

Description		
•Overall Length	4785 mm	188 Inches
•Overall Width	2110 mm	83 Inches
•Overall Height	2005 mm	79 Inches
•Wheelbase	2760 mm	108.7 Inches
•Ground Clearance	210 mm	8.26 Inches
•Entry/Exit Angle	35°	30°
•Ground Clearance	210 mm	8.26 Inches
•Ford Depth	500 mm	19.6 Inches
•Weight (standard car without options)	2125 kg	4684 lb.
•GVWR (standard car without options)	2650 kg	5842 lb.
•Maximum Load Capacity (Passengers and cargo)	525 kg	1157 lb.
•Wheels	18"x6"	Aluminum
•Tire Size	245/60R18	Radial Type
•Front Brakes	Self Adjusting	Hydraulic Disk
•Rear Brakes	Self Adjusting	Hydraulic Drum
• Engine	2.7L 16V In-line 4 cylinder	150hp
• Transmission	6 Speed	Automatic
•Electrical System	12 Volt DC	
•Steering	Rack and Pinion	
•Body	High strength steel	
•Seating Capacity	5	
•Fuel Economy	24.0 MPG	Highway
•Fuel Economy	13.0 MPG	City
•Fuel Economy	18.3 MPG	Combined
•Fuel Tank Capacity	68 Liter	18 US Gallons

Vehicle Details:



Additional vehicle information can be obtained on
<https://uaz.global/cars/suv/upgraded-patriot>

CONFIDENTIAL



ACCEPT:	<input checked="" type="checkbox"/>
Signature:	<i>[Signature]</i>
Date:	08/03/2021

EMISSIONS COMPLIANCE CENTER TEST SUMMARY

Lab Manager: Dan Ogden

Prepared by: Ian Enderby

07/02/2021

The SEMA Emissions Compliance Center is a Certification Ready Automotive Emissions Testing Laboratory located in Diamond Bar, California at 1577 Valley Vista Drive. The lab is equipped with a 48" AVL-Zollner 2 wheel-drive chassis dynamometer, AVL i60 CVS System, AVL i60 AMA emissions analyzer bench with HC, NO_x, CO, CO₂ and CH₄ analyzers, Dilution Tunnel with AVL SPC 478 Particulate Matter (PM) Sampler, and an AVL 4-station Canister Loading Bench.

Client: Bremach

Contact: Ray Hoogenraad (rayhoogenraad@bremach.us)

Test Vehicle: 2021 Bremach 2.7L SUV



Test Vehicle



Tire Info

Test Fuel: Tier 3 E10 Regular

Tire Size: 245/60R18

Vehicle Test Weight: 5000 lbs.

Dyno Set Coefficients: A=25.641, B=-0.16658, C=0.036492

Dyno Target Coefficients: A=44.554, B=0.22708, C=0.035315

Notes:

- The test vehicle remained in the custody of the SEMA Emissions Lab staff throughout the testing process.
- All emissions testing was conducted with an AVL road speed fan.

ATTACHMENTS

- Vehicle Check In Form
- Road Load Determination Printouts
- FTP-74 Test Report (Test ID: UDDS_20210701_02_TC1)
- Canister Load Report (Test ID: CL3-2021-07-01-171)
- FTP-75 Test Report (Test ID: FTP75_20210702_01_TC1)
- HWFET Test Report (Test ID: HWFET_HWFET_20210702_02_TC1)
- US06 Test Report (Test ID: US06_US06_20210702_03_TC1)
- SC03 Test Report (Test ID: SC03_SC03_20210702_04_TC1)

PROCEDURE SEQUENCE

- 06/28/21: Vehicle Check In
- 06/30/21: Drain and Fill with Test Fuel
- 06/30/21: 6-36 hour soak
- 07/01/21: Road Load Determination
- 07/01/21: Prep for FTP-75 (FTP-74 Precondition w/ no bags, (Test ID: UDDS_20210701_02_TC1)
- 07/01/21: Drain and Fill with Test Fuel
- 07/01/21: 12-36 hour soak/1.5X Canister Load (Test ID: CL3-2021-07-01-171)
- 07/02/21: FTP-75 (Test ID: FTP75_20210702_01_TC1)
- 07/02/21: HWFET (Test ID: HWFET_HWFET_20210702_02_TC1)
- 07/02/21: US06 (Test ID: US06_US06_20210702_03_TC1)
- 07/02/21: SC03 (Test ID: SC03_SC03_20210702_04_TC1)

RESULTS SUMMARY

Full DFs (Assigned T3B160/LEV3 LEV160 DF's)				
NMOG	NOX	CO	PM	HCHO
0.0198	0.0149	0.50	0.0000	0.0006

Vehicle Mileage=	4099
Ex. Useful Life=	150000
UL Factor=	0.1%
NMHC/NMOG Ratio=	1.10

	NMHC	NMOG	NOx	NMOG+NOx	CO	PM	HCHO
FTP Test Result	0.1221	0.1343	0.0429		1.0897	0.0004	0.0020
Additive DF		0.0198	0.0149		0.4997	0.0000	0.0006
Result		0.1541	0.0578	0.2119	1.5894	0.0004	0.0026

HWFET Test Result	0.0979	0.1077	0.1030		1.6156		
Additive DF		0.0198	0.0149		0.4997		
Result		0.1275	0.1179	0.2454	2.1153		

US06 Test Result	0.0822	0.0904	0.2243		3.1759	35.8592	*
Additive DF		0.0198	0.0149		0.4997	0.0000	*
Result		0.1102	0.2392	0.3494	3.6756	35.8592	*

SC03 Test Result	0.1437	0.1581	0.0209		2.5330		
+20% for AC2		0.0316	0.0042		0.5066		
Additive DF		0.0198	0.0149		0.4997		
Result		0.2095	0.0400	0.2494	3.5393		

	NMOG+NOx	CO	PM	HCHO*
FTP UL Std.	0.160	4.2	0.003	4
Final Result	0.212	1.6	0.0004	2.6
% of Std	132.4%	37.8%	13.3%	65.0%
PASS/FAIL	FAIL	PASS	PASS	PASS

	NMOG+NOx
HWFET UL Std.	0.160
Final Result	0.245
% of Std	153.4%
PASS/FAIL	FAIL

	PM*
US06 UL Std.	6
Final Result	36
% of Std	597.7%
PASS/FAIL	FAIL

	NMOG+NOx	CO
Composite UL Std.	0.150	4.2
Final Result	0.264	2.9
% of Std	176.2%	68.9%
PASS/FAIL	FAIL	PASS

Results Summary Notes

- All values shown in grams per mile unless marked with a *, in which case it is milligrams per mile
- Light grey cells with italicized numbers are calculated
- Used assigned LEV160 DFs and adjusted by 0.1% for vehicle mileage of 4,099



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY
2565 PLYMOUTH ROAD
ANN ARBOR, MICHIGAN 48105-2498

OFFICE OF
AIR AND RADIATION

Exemption Number: 2020-NOVEMBER-LD-TEST-I-13811

11/18/2020

Miro Kefurt
CEO
BREMACH, Inc.
P.O. Box 19294
Jean, NV 89019

Dear Miro Kefurt:

This letter is in response to your request received on November 09, 2020 for a testing exemption for a nonconforming vehicle(s) or engine(s) under EPA regulations at 40 CFR 85.1511(b)(2). Based on the information you have provided to us and subject to the terms and conditions set forth below, EPA approves this exemption request for the following vehicle(s)/engine(s):

QUANTITY	MAKE	MODEL	MODEL YEAR	ID TYPE	ID NUMBER
1	UAZ	Patriot	2021	Vehicle Identification Number	XTT316300M1001007
1	UAZ	Patriot	2021	Vehicle Identification Number	XTT316300M1000102

This testing exemption is valid from November 18, 2020 until November 18, 2021. This testing exemption covers the subject vehicle(s)/engines(s) only under your full compliance with the enclosed Terms and Conditions. As outlined in the terms and conditions, at the end of the testing period, you must either request an extension of the exemption from the EPA prior to the expiration date or remove the vehicle(s)/engine(s) from exempt status.

A breach of any term or condition shall cause the exemption granted pursuant to this approval to be void. Consequently, the introduction or delivery for introduction into commerce of the subject vehicle(s)/engine(s) other than in strict conformity with all terms and conditions shall constitute a violation of section 203 (a)(1) of the Clean Air Act, and you may be subject to a civil penalty as codified at 40 CFR 1068.101 per violation under section 205

of the Act, as well as other penalties. In addition, noncompliance may result in the seizure of the engine(s) by U.S. Customs and Border Protection.

If you have any questions, please do not hesitate to contact David Hurlin at 734-214-4100 or e-mail to imports@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Linc Wehrly", with a stylized, flowing script.

Linc Wehrly, Director
Light-Duty Vehicle Center
Compliance Division



Testing Exemption Terms and Conditions

If you elect to accept the exemption, you must:

If the requestor elects to accept the exemption, the requestor must:

- (a) Agree to conduct the testing program as described in the documentation provided with the initial request upon which this approval is based
- (b) Agree not to sell or otherwise transfer ownership to another party in the U.S.
- (c) Agree not to operate the vehicle(s) on public roads or highways in the U.S. except as necessary for the test program as described in the documentation provided with initial request upon which this approval is based
- (d) Create, maintain, and make available at reasonable times for review or copying by appropriate EPA officials records which provide each engine serial number or vehicle or equipment identification, indicate the use of the engine, vehicle or equipment on exempt status and indicate the final disposition of any engine, vehicle or equipment removed from exempt status; these records shall be maintained by the manufacturer for a period of one (1) year after the engine, vehicle or equipment has been removed from exempt status. For approved exemption requests where VIN(s) are not provided by the requestor at the time of approval, send quarterly reports of the appropriate numbers and dates of when the vehicle(s) are placed under exempt status and when removed from this exemption.
- (e) At the end of the testing period, either request an extension of the exemption from EPA prior to the expiration date or remove the vehicle(s)/engine(s) from exempt status by performing one of the following for each vehicle(s)/engine(s) that is removed from exempt status:
 - (1) Obtain prior EPA approval to extend the exemption (before the current exemption expires for a subsequent one year period) or
 - (2) Regain physical possession of the subject vehicle(s)/engine(s) and remove from commerce by exporting or destroying the vehicle(s)/ engine(s); or
 - (3) Return the vehicle(s)/engine(s) to the original certified configuration or obtain a certificate and certify the vehicle(s) in their new configuration.

(f) Take steps as may be necessary to prevent any violations of the terms and conditions for this exemption by any person.

This exemption shall be deemed to cover the subject vehicle(s)/engine(s) only under full compliance with the above terms and conditions. A breach of any term or condition shall cause the exemption to be void. Consequently, the introduction or delivery for introduction into commerce of the vehicles(s) other than in strict conformity with all terms and conditions shall constitute a violation of section 203 (a)(1) of the Clean Air Act, and you may be subject to a civil penalty as codified at 40 CFR 1068.101 per violation under section 205 of the Act, as well as other penalties. In addition, noncompliance may result in the seizure of the engine(s) by U.S. Customs and Border Protection.



Hurlin, David

From: mirox@aol.com
Sent: Wednesday, October 13, 2021 6:43 PM
To: Imports
Subject: Re: Exemption Number: 2020-NOVEMBER-LD-TEST-I-13811
Attachments: BREMACH-UAZ-EPA-Test3.pdf; BREMACH 2020-NOVEMBER-LD-TEST-I-13811.pdf; 2021.07.02 TSR - Bremach 2.7L SUV - T153.A01.RD. (1).pdf

Hello Mr. Hurlin:

As requested please see the 3 attachments in PDF

New Exemption Extension Letter request
Original EPA Exemption confirmation letter
Emission Test Summary from SEMA Laboratory

Miro Kefurt
BREMACH, Inc.

PS: If there is any other information you also need please let me know.

-----Original Message-----

From: Imports <Imports@epa.gov>
To: mirox@aol.com <mirox@aol.com>
Sent: Wed, Oct 13, 2021 4:52 am
Subject: RE: Exemption Number: 2020-NOVEMBER-LD-TEST-I-13811

Miro Kefurt,
To apply for an extension you will need to submit a new application letter. Your application letter should be about the same as your original application except for you will need to list what testing has been completed and what testing still needs to be done. With your application letter you will need to include a copy of the original exemption that was issued.

David C. Hurlin
EPA Imports Line, Exemptions
Managed by Jacobs, Contractor to the U.S. EPA
Phone: (734) 214-4098 or 4100
Fax: (734) 214-4676

From: mirox@aol.com <mirox@aol.com>
Sent: Tuesday, October 12, 2021 4:00 PM
To: Imports <Imports@epa.gov>
Subject: Exemption Number: 2020-NOVEMBER-LD-TEST-I-13811

Exemption Number: 2020-NOVEMBER-LD-TEST-I-13811

In relation to the above exemption (PDF attached)

We would like to ask for additional one year extension, as due to Covid and other issues with the test vehicles our testing and certification program is delayed by about 6 to 9 months.

We need to do further engine mapping as to be able to meet the ULEV 160 emission requirements and we are currently working on that with the OEM (UAZ in Russia).

What additional information (if any) you need from me to be able to grant this testing extension ?

We plan to apply for EPA CoC and CARB EO sometimes in late 2022.

Sincerely

Miro Kefurt
CEO
BREMACH, Inc.

PS: Vehicles are currently stored at 95 N Cree St. Sandy Valley Nevada 80919
When ever we need to take them to Emission Test Laboratory in Diamond Bar, California (SEMA Lab) they are transported in enclosed trailer that we have purchased for that purpose.